

# Composite Exhibit A

**BOIES SCHILLER FLEXNER LLP**

Brooke Alexander (pro hac vice pending)

balexander@bsflp.com

333 Main Street

Armonk, NY 10504

Telephone: (914) 749-8200

Facsimile: (914) 749-8300

**BOIES SCHILLER FLEXNER LLP**

Mark C. Mao (SBN 236165)

mmao@bsflp.com

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

Telephone: (415) 293-6800

Facsimile: (415) 293-6899

Attorneys for Plaintiffs,

Edwin Garrison, Gregg Podalsky,

Skyler Lindeen, Alexander Chernyavsky,

Gary Piano, Sunil Kavuri, Gary Gallant

and David Nicol

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

EDWIN GARRISON, GREGG PODALSKY,  
SKYLER LINDEEN, ALEXANDER  
CHERNYAVSKY, GARY PIANO, SUNIL  
KAVURI, GARY GALLANT and  
DAVID NICOL, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

GOLDEN STATE WARRIORS, LLC and  
STEPHEN CURRY,

Defendants.

**Case No. 3:23-cv-03628**

**CLASS ACTION COMPLAINT**

**DEMAND FOR JURY TRIAL**



1 fraud here was worse than Enron. Billions of dollars have been stolen from investors across the  
2 globe. These Defendants conspired and aided and abetted FTX's multi-billion-dollar fraud and  
3 conversion for their own financial and professional gain.



23           3.       What's more, FTX would not have been successful in perpetrating this fraudulent  
24 scheme on Plaintiffs and Class Members around the globe without key events that took place in  
25 and emanated from Miami, Florida, which not only eventually became FTX's official headquarters  
26 but was their de facto domestic headquarters for years before FTX's eventual collapse. According  
27 to the Declaration of Dan Friedberg, attached as **Exhibit B**, FTX maintained an office in Miami,  
28

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Facsimile: (914) 749-8300

**BOIES SCHILLER FLEXNER LLP**

Mark C. Mao (SBN 236165)

mmao@bsfllp.com

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

Telephone: (415) 293-6858

Facsimile: (415) 999-9695

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

EDWIN GARRISON, GREGG  
PODALSKY, SKYLER LINDEEN,  
ALEXANDER CHERNYAVSKY,  
GARY PIANO, SUNIL KAVURI,  
GARY GALLANT, & DAVID NICOL  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

SHOHEI OHTANI, NAOMI OSAKA,  
LAWRENCE GENE DAVID &  
SOLOMID CORPORATION, D/B/A  
TEAM SOLOMID, TSM AND/OR  
TSM FTX

Defendants.

Case No.: 2:23-cv-05951

**CLASS ACTION COMPLAINT**

**JURY DEMAND**

1 Plaintiffs, on behalf of themselves and all others similarly situated, sue  
2 Defendants, who all promoted, assisted in, and/or actively participated in FTX  
3 Trading LTD d/b/a FTX's ("FTX Trading"), West Realm Shires Services Inc. d/b/a  
4 FTX US's ("FTX US"), and Alameda Research, LLC's (collectively, the "FTX  
5 Group" or "FTX"), offer and sale of unregistered securities, including but not  
6 limited to the Deceptive FTX Platform, identical FTX yield-bearing accounts  
7 ("YBAs") and FTX's native cryptocurrency token, "FTT," and also aided, abetted  
8 and/or actively participated in the FTX Group's massive, multibillion dollar global  
9 fraud.

### 10 INTRODUCTION

11 1. This Action is a Related Action to the multidistrict litigation *In re:*  
12 *FTX Cryptocurrency Exchange Collapse Litigation*, No. 1:23-md-3076 (S.D. Fla.)  
13 (the "FTX MDL"), pending in the United States District Court for the Southern  
14 District of Florida before the Honorable K. Michael Moore (the "Transferee  
15 Court"). A copy of the Transfer Order issued by the United States Judicial Panel  
16 on Multidistrict Litigation (the "Panel") in *In re: FTX Cryptocurrency Exchange*  
17 *Collapse Litigation*, MDL No. 3076, ECF No. 138 (J.P.M.L. June 5, 2023), is  
18 attached as **Exhibit A**. A Notice of Potential Tag-Along Action is being  
19 concurrently filed before the Panel in accordance WITH Rule 7.1(a) of the Panel's  
20 Rules of Procedure. This Related Action, which was originally filed in the Southern  
21 District of Florida, *Garrison, et al. v. Sam Bankman-Fried, et al.*, No. 1:22-cv-  
22 23753-KMM (S.D. Fla.) is being filed again before this Court in this District in  
23 order to address the arguments Defendants Ohtani, Osaka, David, and Solomid  
24 Corporation raise regarding whether the Transferee Court has jurisdiction over  
25 them for these claims. The substantive allegations in both actions are the same, and  
26 will be amended in a consolidated amended class action complaint currently due to  
27  
28



1 be filed August 7, 2023, once transferred to the Transferee Court and consolidated  
2 into the FTX MDL.

3 2. Everyone now agrees the FTX Disaster is the largest financial fraud  
4 in US history. Sam Bankman-Fried, FTX's founder and former CEO, is on house  
5 arrest awaiting his criminal trial in October of this year. FTX's new CEO—who  
6 helped wind down Enron—concluded the fraud here was worse than Enron.  
7 Billions of dollars have been stolen from investors across the globe. These  
8 Defendants conspired and aided and abetted FTX's multi-billion-dollar fraud and  
9 conversion for their own financial and professional gain.

